

**CLEARY GIACOBBE ALFIERI JACOBS, LLC**

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**Attorneys for Defendants, Neptune City Police, Michael Volbrecht and Edward Kirschenbaum**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JACQUELYN REAVES

Plaintiff,

v.

MONMOUTH UNIVERSITY, JOANNE JODRY, GEORGE KAPALKA, GREY DIMMENA, NINA ANDERSON, CHARLENE DIANA, MARY ANNE NAGY, FRANCA MANCINI, NEPTUNE CITY POLICE, KEITH MITCHELL, MICHAEL VOLBRECHT, EDWARD KIRSCHENBAUM, MONMOUTH UNIVERSITY POLICE, JEFF LAYTON, WILLIAM MCELRATH, MONMOUTH MEDICAL CENTER, DALE RAFINELLO, ANTHONY TRACHTA, AMINA CHOWDHURY, MATTHEW GELLER, VIRGINIA KINNEMAN, JACKLYN SANTIAGO, TRENTON PSYCHIATRIC HOSPITAL, PATRICK ERVILUS, ROBERT WOOD JOHNSON UNIVERSITY, HOSPITAL, JAMES MCCALLUM, ROBERT CAVELLA, KATIE OZOLINS,

Defendants.

*CIVIL ACTION*

Docket No. 3:22-cv-01782-PGS-RLS

**APPLICATION FOR EXTENSION  
OF TIME TO ANSWER, MOVE  
OR OTHERWISE REPLY**  
**PURSUANT TO LOCAL RULE 6.1(B)**

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order extending time within which Defendants, Neptune City Police, Michael Volbrecht and Edward Kirschenbaum ("Neptune Defendants"), may Answer, Move or Otherwise Reply to the Amended

Complaint filed by Plaintiff and entered on the docket on April 6, 2022, for an additional fourteen (14) days, and in support of such application it is represented that:

1. No previous extensions have been obtained to respond to Plaintiff's Complaint;
2. Receipt of Plaintiff's Complaint by counsel for the Neptune Defendants was via email on April 27, 2022;
3. Defendants' time to Answer, Move or Otherwise Reply therefore expires on Wednesday, May 11, 2022, and as such this application for a Clerk's Order for an extension herein is timely.

**CLEARY GIACOBBE ALFIERI JACOBS, LLC**

Attorneys for Defendants, Neptune City Police,  
Michael Volbrecht and Edward Kirschenbaum,

By: *s/Jodi S. Howlett*  
Jodi S. Howlett, Esq.

Dated: May 10, 2022